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October 10, 2016

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (MG)**

Letter Regarding Update on Related Proceedings

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Judge Gerber’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically, on October 7, 2016, counsel to New GM and Lead and Liaison Counsel filed a joint letter (“**Joint Letter**”) addressed to Judge Furman setting forth the parties’ tentative agenda for the October 13, 2016 Status Conference in MDL 2543. A copy of the Joint Letter is attached hereto as **Exhibit “A.”** In addition, also on October 7, 2016, the parties in MDL 2543 filed letters (and competing proposed orders) with the District Court regarding issues related to the MDL plaintiffs’ Fourth Amended Consolidated Complaint. Copies of New GM’s letter and Lead Counsel’s letter are attached hereto as **Exhibits “B”** and **“C”** respectively.

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

SD/hs
Encl.

cc: Parties Set Forth On Schedule "1" Annexed Hereto.

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SCHEDULE 1

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Parties to the Motion to Enforce, filed by New GM on June 1, 2016 [Dkt. No. 13634]

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Parties to the Motion to Enforce filed by New GM on June 24, 2016 [Dkt. No. 13655]

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Parties Subject to the Pilgrim Motion to Enforce

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